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NCBC GULFPORT
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AIR FORCE RESPONSE TO EPA REGION IV QUESTIONS REGARDING INCINERATOR
TRIAL BURN NCBC GULFPORT MS
4/26/1987
U S AIR FORCE

RESPONSE TO QUESTIONS

NAJA/EPA

PREPARED BY

AIR FORCE

ENGINEERING AND SERVICES

CENTER

25 APRIL, 1987

QUESTION

Is the incinerator liquid discharge going to be measured in quantity so that no more than 7200 gallons is discharged unless a new permit process is begun?

ANSWER

The current State of Mississippi wastewater discharge permit (PT90249) allows the Air Force to discharge up to 7200 gallons/day into the Harrison County wastewater collection system. The stated permit requires that samples of the wastewater to be discharged be analyzed for components of Herbicide orange and meet the conditions of the permit. Each batch discharged will be a measured quantity that complies with the permit conditions.

QUESTION

Are the readings and sample results going to be recorded, and, if they are, where will be available for public examination?

ANSWER

Results of laboratory tests and quantities of wastewater discharged are required by state permit to be submitted to the Mississippi Bureau of Pollution control. By law the permittee must keep copies of the operational records for a period of three (3) years.

QUESTION

When will the trial period begin and when will it conclude? What criteria will decide whether or not the trial period proved the Gulfport incinerator is safe and effective?

ANSWER

The first trial of the incinerator took place during December, 1986. The Verification test burn concluded on 16 December, 1986. Data from the December test was submitted to the Mississippi Bureau of Pollution Control and to EPA, Region 4. Results of the study demonstrated that the incinerator is capable of removing Herbicide Orange components from contaminated soil to levels not detected at 1 part per trillion. Components of Herbicide orange were not detected in the scrubber water discharge or in stack gas samples. Ambient air samples collected down wind of the incinerator and soil excavations during the December test did not detect any dioxin. criteria for a successful test are listed in Table 1. A second test employing chemical substitutes for dioxin will be conducted in early May, 1987. The criteria for this test will be the demonstration of 99.9999% DRE for the chemical surrogates. Data from the second test will be submitted to the regulatory agencies and reviewed against the stated criteria.

TABLE 1
TEST CRITERIA

MATRIX	CRITERIA
Treated Soil	< 1 part per billion
Ambient Air	< 3 pg/cubic meter
Scrubber Water	< 10 parts per trillion
Stack Gas	
2,3,7,8-Tetrachlorodibenzo-p-dioxin	> 99.9999% DRE
Other Components	> 99.99% DRE

QUESTION

What is the name of the contractor-operator? Where are its corporate offices? What types and amounts of liability insurance does it have for this operation.

ANSWER

The U. S. Navy is the facility owner and the U. S. Air Force is the facility operator as listed in the Resource Conservation and Recovery Act permit number: MS2 170 022-626. The Air Force Engineering and Services Center has established a prime contractor relationship with the Idaho National Engineering Laboratory which is operated by EG&G Idaho for the Department of Energy. EG&G has subcontracted with the ENSCO Corp. , Little Rock Arkansas, to lease their incinerator. The unit is operated by ENSCO under the management of EG&G Idaho and the U. S. Air Force, Engineering and Services Center. Since the U. S. Air Force is listed as the operator of the incinerator, the Federal Government has responsibility for any adverse situations that occur as a result of the incinerator operation. Any liability questions would be decided by the courts. ,

QUESTION

What is the procedure to be followed in the event that an emergency or an "out-of -normal specification is indicated.

ANSWER

The Spill Prevention and Control And Countermeasures Plan, which has been incorporated as part of the EPA permit. This plan dictates the response required under certain emergency situations. The responses are dependent on the specific situation. Generally, the response would include the immediate shutdown of the incinerator feed system, notification of the project manager, safety personnel, NCBC Environmental Coordinator, and State/Federal regulatory agencies. The on-site emergency response will be directed by the ENSCO health and safety officer and the project manager. Out-of-normal operational specifications generally trigger an automatic waste feed shut-off (AWFSO) and/or the shutdown of the incinerator. There are numerous operational set points that are controlled by the incinerator data management system. Exceeding one of these set points would actuate AWFSO contraindicated and manually operated systems are also included. Should an AWFSO be actuated the system operators and project manager will review the event that triggered the AWFSO and take necessary corrective action.